

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARLES EDWARD SEVERT, JR.,

Defendant.

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CASE NO. 3:21-cr-21

JUDGE Walter H. Rice

INDICTMENT

18 U.S.C. § 1001

18 U.S.C. § 641

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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

THE GRAND JURY CHARGES:

COUNT 1

On or about July 20, 2016, in the Southern District of Ohio, the defendant, **CHARLES EDWARD SEVERT, JR.**, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation: to wit, he stated that he had not worked since 2010. The statement and representation was false because, as **CHARLES EDWARD SEVERT, JR.** then and there knew, he had been working since at least 2014 in the tree trimming industry.

In violation of Title 18, United States Code, Section 1001.

COUNT 2

On or about July 20, 2016, in the Southern District of Ohio, the defendant, **CHARLES EDWARD SEVERT, JR.**, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation: to wit, he stated that his securities license had been suspended for unreported outside business activity, specifically, “flipping” houses. The statement and representation was false because, as **CHARLES EDWARD SEVERT, JR.** then and there knew, on or about March 24, 2011, the Financial Industry Regulatory Authority (FINRA) barred him from associating with any FINRA member firm in any capacity for taking \$20,000 from a church in Xenia, Ohio without authorization and for failing to provide information about that incident to FINRA.

In violation of Title 18, United States Code, Section 1001.

COUNT 3

On or about July 22, 2017, in the Southern District of Ohio, the defendant, **CHARLES EDWARD SEVERT, JR.**, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation: to wit, in a consultative examination for the purpose of determining his continuing eligibility for Social Security disability benefits, he stated he was currently unemployed and had not worked since 2010. The statement and representation was false because, as **CHARLES EDWARD SEVERT, JR.** then and there knew, he had been working since at least 2014 in the tree trimming industry.

In violation of Title 18, United States Code, Section 1001.

COUNT 4

On or about July 22, 2017, in the Southern District of Ohio, the defendant, **CHARLES EDWARD SEVERT, JR.**, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation: to wit, in a consultative examination for the purpose of determining his continuing eligibility for Social Security disability benefits, he stated that he quit his job as a financial planner in 2010 because he had problems with concentration after he was the victim of a shooting in September 2010. The statement and representation was false because, as **CHARLES EDWARD SEVERT, JR.** then and there knew, he was terminated from his job as a financial planner in or about June 2010.

In violation of Title 18, United States Code, Section 1001.

COUNT 5

From in or about December 2016, and continuing through in or about April 2019, in the Southern District of Ohio, the defendant, **CHARLES EDWARD SEVERT, JR.**, on a recurring basis, did knowingly and willfully embezzle, steal, purloin, convert to his own use and the use of another, and without authority sell, convey and dispose of money belonging to the United States and a department and agency thereof in a total amount greater than \$1,000, namely, Social Security benefits having a value of approximately \$370,928.30.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL

11/5/11 SIGNED

GRAND JURY FOREPERSON

**VIPAL J. PATEL
UNITED STATES ATTORNEY**

Tim Landry

**TIMOTHY LANDRY
SPECIAL ASSISTANT UNITED STATES ATTORNEY**